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| UNITED STATES OF AMERICA | ) |
| | )     **STIPULATION OF** |
| v. | )     **EXPECTED TESTIMONY** |
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| Manning, Bradley E. | )     SSG Alejandro Marin |
| PFC, U.S. Army, | ) |
| HHC, U.S. Army Garrison, | ) |
| Joint Base Myer-Henderson Hall | )     **DATED:** 3Ø May 2013 |
| Fort Myer, Virginia 22211 | ) |

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if SSG Alejandro Marin were present to testify during the merits and pre-sentencing phases of this court- martial, he would testify substantially as follows.

1. I, SSG Alejandro Marin, am currently deployed to Afghanistan as a Counterintelligence Analyst in the G-2 (Intelligence) section for the 333d Military Police Brigade. My Military Occupation Specialty (MOS) is 35L, Counterintelligence Agent. My responsibilities in this position include gathering tactical intelligence in our Area of Operation.

2. From 2002-2006, I was enlisted in the United States Marine Corps with an MOS of Infantry. In July 2007, I enlisted in the United States Army Reserve with an MOS of 11B, Infantry. In early 2008, I reclassified with an MOS of 35F, All-Source Intelligence Analyst. From April 2008 until August 2008, I attended the Intelligence Analyst Course at Advanced Individual Training (AIT) in Fort Huachuca, Arizona. I was assigned to the 305th Military Intelligence Battalion.

3. PFC Bradley Manning and I attended AIT together. PFC Manning and I were in all of the same classes together at AIT and received the same instruction. The class consisted of approximately 20-25 students, two of whom were PFC Manning and me. I interacted with PFC Manning on a daily basis. Troy Moul was our AIT instructor.

4. At AIT, I was trained on pattern analysis, which is the study of the enemy's Tactics, Techniques, and Procedures (TTPs) to determine any patterns in enemy activity. I was also trained on how to collect intelligence products and how to map enemy activity as part of pattern analysis. I was also trained extensively on the use of Significant Activities (SIGACTs), which are stored in the Combined Information Data Network Exchange (CIDNE) database on the Secure Internet Protocol Router Network (SIPRNET), a classified network. I was also trained that SIGACTs consist of troop location, Improvised Explosive Device (IED) attacks, and assassinations. Additionally, I was trained on how to research, review, and pull SIGACTs and plot them on a map for pattern analysis.

5. At AIT, I was trained on the targeting process. I was also trained on how to collect information on High Value Targets (HVTs), to include which databases to use and what type of information is helpful to the targeting process. I was also trained that the intelligence we provided on these HVTs may be employed to carry out military operations to capture these persons. During this instruction, I was also trained on how to use Intelink, a search engine on the SIPRNET similar to Google.

6. At AIT, I was trained on Information Security (INFOSEC). I was also trained on the meaning of classification, to include the different levels of classification. Specifically, I was trained that the unauthorized disclosure of information classified at the SECRET level reasonably could be expected to cause serious damage to the national security and that the unauthorized disclosure of information classified at the CONFIDENTIAL level reasonably could be expected to cause damage to the national security. I was also trained on the meaning of information marked For Official Use Only (FOUO). I was also trained to properly mark not only classified documents at the top and bottom of each document, but also classified media devices with the approved label. I was further trained that we had a personal responsibility to safeguard classified information. I was also trained that access to classified information is limited to those persons with the proper security clearance, signed Non-Disclosure Agreement, and a need-to-know. I was also trained how to store, transmit, and otherwise handle classified information consistent with Army Regulation 380-5.

7. At AIT, I was trained on Operational Security (OPSEC). I was trained not to publicly disclose anything that could be useful to our adversaries, both foreign and domestic. I was also trained on the dangers of putting information on the Internet, to include social media websites. I was also trained on how the enemies of the United States, including Al Qaeda, use the Internet by searching websites for many purposes, such as to collect intelligence on the United States and for use as propaganda and as a recruiting tool. I was trained that OPSEC applies to unclassified information, such as information relating to training schedules and unit morale. At AIT, I was aware that PFC Manning had to give a five minute brief on OPSEC.

8. With regards to BATES numbers 00007351-00007426, 00007450-00007586, 00007629-00007789, 00007983-00008087, 00008152-00008288, 00008331-00008522, 00008853-00009046, 00009802-00010037, and 00010722-00010843, I have reviewed all of these slides. The formatting of the slides is very recognizable to me. As I reviewed the slides, my memory makes me believe that these were the slides that were given to us at AIT. The slides were multiple classes in one presentation. To the best of my knowledge, these slides appear to be the ones used for our classes because of the formatting and content contained in the slideshow. I remember being trained on the content of these slides at AIT, such as memorizing the "CARVERSHP" mnemonic device at BATES number 00010767. However, I cannot say for certain that these are the actual slides or the actual information from the slides given to us due to the length of time that has gone by. It has been five years since I have seen the slides. I also cannot say for certain that these are the slides because not all of the slides were used in all the classes due to time constraints or a class being shortened. At a minimum, these slides are very similar to the slides I received during AIT.

9. At AIT, PFC Manning participated in a Field Training Exercise (FTX), during which PFC Manning created various intelligence products, such as targeting packets on HVTs. I was a team leader during this FTX and had the opportunity to review PFC Manning's work product. PFC Manning's strengths included computer-related tasks, such as pulling data from databases containing intelligence products.

10. I was an All-Source Intelligence Analyst for approximately four years. In 2012, I reclassified with an MOS of 35L, Counterintelligence Agent.


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